

Samuel T. Poole

ORIGINAL

No.

V.

1983 Complaint

Att.Gen. Jane Brady

State Police

Tr. Judge

Family Court

05 - 233

FILED

APR 21 2005

U.S. DISTRICT COURT
DISTRICT OF DELAWARE

COMPLAINT

1.This is a Civil Action Authorized by 42 U.S.C.Section 1983 to redress the the deprivation,under Color of state law and federal of rights secured by the Constitution of the United States.

2.Federal Question Jurisdiction

title 28§1331, The district court shall have original Jurisdiction of all Civil Actions arising under the Constitution,Laws,or Treaties of the U.S. Title 28§1332(A)over 75,000 sum Title 28§ 1343(A)(1)(2)(3) Title 28§(BX1). Title 28§535(A) Acticle 111§ To fraud on the Courts and 18 U.S.C. 1962(C) (D) also see 28§ 1968(AX3)(4)(J).

3.The U.S. District Court in NewCastle Delaware.

4. Plaintiff, Samuel T. Poole No. BN-5599 P.O. Box 1000 Houtzdale,PA 16698-1000.

5. Defendants is the Attorney General Jane Brady,and State Police in Dover Delaware and Family Court in NewCastle.

They all are legally responsible for the overall criminal Justice system in the State of Delaware.

6.Plaintiff seeks declaratory relief Pursuant to 28§ U.S.C. Sec.2201 and 2202 Plaintiff claims for injunctive relief are authorized by 28§ U.S.C. 2283 and 2284 and R.65 of the F.R. Civ. P. Pending and investigation and Show Cause hearing in this matter.

7.Exhaustions of all Legal Remedies.

8.Legal Claims

The violation,Failure to Act bringing Charges of Crimes,Briverty,Rico, Fraud on the Courts,Child in danger,Cover up.

9.Plaintiff has no plan,adequate or complete remedy at Law to read redress the wrongs described herein,Plaintiff has been and will continue to be irreparably injured by the Criminal Conduct of the defendants failure to Act allowing the crime to continue with a blindeye from the Justice System.

Unless this Court grant the declaratory and injunctive relief which plaintiff seeks.

Wherefore, Plaintiff respectfully prays that this court enter Judgement granting plaintiff's request.

10.A declaration that the Acts and omissions described herein violated Plaintiff's rights under the Constitution and laws of the United States.

11.A Preliminary and Permanent injunction ordering defendants Attorney General, State Police, Family Court to Stop Covering up the criminal Acts within it's family court and filing the criminal charge against all parties that committed the crime bying the Clerk in family court, Sister in-law in the State of Ohio where the D.N.A. test were forged at and Emma Hayes, Holly Hughes and the person acted with this Chain of Conspiracy Florence F. Wright Delaware had jurisdiction by the child being a resident of the State of Delaware and not PA.

12.Compensatory damages in the amount of \$_____ against each defendants, Jointly and severally.

13.Punitive damages in the amount of \$_____ against each defendants.

14.A Jury trial on all issues Triable by Jury.

15. Plaintiff's costs in this Suit.

16.Any additional relief's this Court deems Just, Proper, and equitable 28§ U.S.C. Sec. 1367 all State Laws.

Dated: 4-14-05

Respectfully Submitted



Samuel T. Poole Bn-5599

P.O. Box 1000

Houtzdale, PA 16698-1000

Notary

Acknowledged before me by
SAMUEL POOLE this
14 day of APRIL, 2005


Notary Public

NOTARIAL SEAL
ROBERT W. PARKS, III, NOTARY PUBLIC
SCI-HOUTZDALE, CLEARFIELD COUNTY
MY COMMISSION EXPIRES DECEMBER 1, 2008

17. Complaint

I been requesting for criminal Charges by the proper authorities to take Action for the past couple of years even the U.S. Attornet's office. The defendants NO response and then the Family Court wants to resjudicata but the same court still gives out forged documents-(D.N.A. Test) when I go to resolve the matter the Court then plays a blindeye to the matter. The test that was forged May,2000,two years later shows up in another family Court hearing in PA. To stop investigation Ultra Vires and that all hearings was criminally done and because of the wrongdoing is control 100% be the defendants and in Petitions 1-and2 this is a completely control over Criminal justice System,Family Court and any investigation would of clearly showed. But because they are liable for there actions because they failed to act and allow both my kids to be placed in danger of abuse I now find this out within the last couple of months ,this state blaming Delaware but the State of PA. Just or liable for the criminal conduct.

The second document, Supplemental and amend I'm making sure nobody gets imunity in this case because of the criminal charges are Rico Cover up.,Forgery,Bribery,Childindangerment,Kidnapping,Chain of Conspiracy about them having Jurisdiction about these hearings. This is where Ultra Vires(Right hand does not know what the Left hand is doing).

they can get away because clothin of Authority Control all investgation the first amend shows Just about everything this Court needs to know the second one shows Monotary Damages and Compensatory Damages with the crime that has been done by the person that committed the crime and continues today.

VERIFICATION

I have read the foregoing complaint and hereby verify that the matters alleged therein are true,except as to matters alleged on information and belief,and as to those, I believe them to be true. I certify under penalty of perjury that the foregoing is true and correct.

Acknowledged before me by


SAMUEL POOLE14th day of APRIL, 2005.

NOTARIAL SEAL
ROBERT W. PARKS, III, NOTARY PUBLIC
SCI-HOUTZDALE, CLEARFIELD COUNTY
MY COMMISSION EXPIRES DECEMBER 1, 2008


Samuel T. Poole BN-5599

P.O. Box 1000

Houtzdale, PA 16698-1000


Notary Public

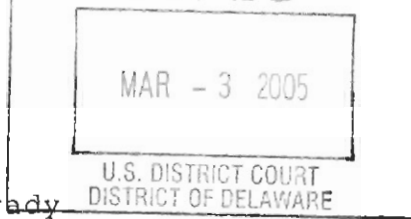
Samuel T. Poole

V.

Att. Gen. Jane Brady

State Police (Dover Del.)

Family Court



Civil Action No.

ORIGINAL

Jury Trial Demanded

*John Doe*Jurisdiction U.S.C. 1983, 1985, 1997, 1981

1. This is a Civil Action Authorized by 42 U.S.C. Sec. 1983, 1985, 1997, redress the deprivation, under color of State Law, and committing crimes of Forgery, Bribery, Kidnapping, and file of State document to have controlling custody Child endangerment, of Rights secured by the Constitution of the U.S. The Court has Jurisdiction Under 28 U.S.C. Sec. 1331, 1332, 1343, Plaintiff seeks declaratory relief Pursuant to 28 U.S.C. Sec. 2201, 2202

2. Plaintiff, Samuel T. Poole BN-5599, is and was at all times mentioned herein a prisoner of the State of Pennsylvania S.C.I. Houtzdale, PA PO. Box 1000, Houtzdale, PA 16698-1000.

3. Defendants, State Police Att. Gen. Office, Family Court every legal Agency that could file the Criminal Charges now because refusal of that State to do so I have written and file no response from State Police or Att. Gen. Family Court Res. Jueata on the Crime to where I have Directly Contacting that Court about all forged papers illegal hearing and DNA test that was taken of Feb. 2000 and May NO reply. This case can also be filed through U.S. Attorney Office and for a Grand Jury investigation, based on Criminal and Misconduct bt the Court but instead cover up this case all the agencies failure to act this court must understand only through a Criminal Investigation. All evidence could be contained only through Criminal Investigation because of the cover and the people that helped committ this crime in both States which continues today the State of Delaware must file Charges as well as PA. But I already filed against PA. Now Delaware's refusal to bring their people to Justice U.S.C. 1983 form has now been entered Statue of limitations there are none (Rico Act), estoppel Multiple Legal Malice and how are you going to argue a crime has been committed over three felony I have no ideal Rico Act Title 1861-(17(A)) Kidnapping any act relating to bribery 18 U.S. Section 201 and now Request for the U.S. Attorney to investigate this case where Att. Gen. Office has either refused of plan to cover it up (1968) Civil investigation Title 18§1968.(A) (B) (2-3) (1-2)(F-1) because of the cover up by the State

being Att. Gen. Dover State Police, and Dept. of Justice Family Court, Smith V. Ross, 482 F.2d 33,36 (6th Cir. 1978) accord, Estelle V. Gamble, 429, U.S. 97. 106 97 S. Ct. 285 (1976) and see Alexander V. Perrill, 916, F.2d 1392(9th Cir.1990) Clearly states failure to act and sitting there not doing anything about it Family Court Murry V. City of Chicago 634 F.2d 365, 366(7th Cir.1980). Misuse of Power Possessed by virtue of State Law and made possible only because the wrongdoer is clothed with the authority of State Law Monroe V. Pape, 365 U.S. Atso; And Clearly the cases was done under Ultra Vires An Act performed without any authority to act on subject. Haslund V. City of Seattle, 86 Wash.2d 607, 547 P.2d 1221,1230 every hearing that was conducted by family Court in two States State of Delaware has Jurisdiction over the case but instead jump back and forth across PA. and Del. lines conducting their crime.

Ultra Vires, Statue of Limitations, Violation of Constitution Rights.

Every hearing that was conducted forged Legal malice Commonwealth V. Coleman, 455 PA.508,318 A.2d 716,717 to clearly show estoppel question Commonwealth Service of Crawford County. V. Claf, 968 F.2d 615(CA3,1983) See Exhibit-A-B Criminal Complaint and the amend for damages it is because of the conduct of the crime being committed by the court that the refusal to investigate the conduct of the court Bank V. U.S. 294 , 665.120,124-125,55 S.Ct.362,364,79 L.Ed 798(1935) But they are taking their forged illegal papers and use to gain Custody of my Son I have asked questions about how they was done without the parents U.S. V. Pennsylvania Industrial Chemical Corp., 411 U.S.655 670-675, 93 S.Ct. 1804,1814-1187,36 L Ed,2d 567(1973) and see Moser V. U.S. 341 U.S.41, 71 S.Ct.553,95 LEd.729(1951).

The misled affect of their illegal documents Changed Birth Certificate forged DNA test forged they could not go through the proper procedure to do so requires and investigation by Child Protective Service see Kaiser V. U.S. 444 U.S.164,178-180,100 S.Ct.383,392.62 L.Ed.2d 332(1979) Santobello V. New York, 404 U.S.257,92 S.Ct.495,30 L.Ed.2d 427(1971); Branson V. Wirth, 17 Wall.32,42,21 L.Ed.566(1973) to clearly show all their case Heckler V. Community Health Sev. Cite ar 104 S.Ct.2218-(1994) But there are more ways to show that there is clearly Affirmative Misconduct Frederick V. Comm.of Internal Revenue, 126 F3d 433,438 3rd Cir.1997; U.S. V. Pepperman, 976 F.2d 123,131 3rd Cir.1992; U.S. V. Asmar, 827 F.2d 907,912(3rd Cir.1987; White Industy, 72 F Supp.2d.at 551. Cook V. Persion 1085,1090(S.D.N.Y.1987).

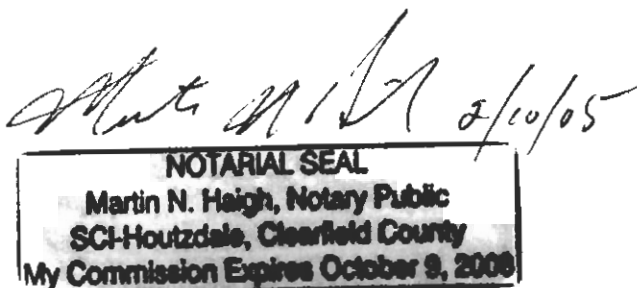
Statue of Limitations. Color of Office.

Last injury is when you fail to file the criminal charge and defend criminal activity within your State you choose to do nothing, Davis V. Guse meyer Citedar 996 F.2d 617(3rd Cir.1993. To show you clearly that to state is liable for the conduct even after 26 years Hazel Alter Glass Co. V. Hartford Empire Co.322 U.S. 238,248-49-64 S. Ct.997,1002-03,88 L Ed 1250(1944) Modified Standard Oil Co. V.U.S. 429,U.S. 1797 S. Ct. 31,50 L Ed 2.d 21(1976)every hearing Conducted in both states based upon crime and color of office,pretence of a Official right to do act made by one who has no such right Kiker V. Pinson,120 Ga. App. 784,172 S.E.2d 333,334,an act under color of office is an act of an officer who claimes authority to do the act be reason of his office when the officer does not confer on him or her any such Authority, Maryland Gas Co. V.McCormack Ky. 488 S.W.2d 347,352.,to which without Legal Right Misuse of Power Possessed by virtue of State Law and made wrongdoer is clothed with Authority of State is action taken under color of Law Atkins V. Lannings D.C. Okl,415 F Supp.186,188,Rico Act U.S. Vignola 464 F. Supp.1091 C.E.D.PA.1979 fraudulent acts taken Felcone 864 F.2d, A229 More Heckler,467 U.S.At 1,0,104 S. Ct. at 2224 and the Defendants took an affirmative steps to conceal the crime U.S. V. Ciambione, C.A.,Nev,750 F.2d 1416,1417 that the person who is sworn in to uphold the Law and refuse to do so Liable Under the Rico Act Att.Gen. Jane Brady State police and Family Court Averbock V. Rival. MFG.Co. Cited as 809 F.2d 1016(3rd Cir.1989) All that needs to be shown is that conspirators agreed to engage in a pattern of Rackateering Activity see U.S. V. Brooklery 685 F.2d 1208,1222(9th Cir.1982) Right of action the right to bring suit; A Legal right to maintain an action, growing out of a giver transaction out of State of facts and based thereon. Right of Action pertains to remedy and relief through Judicial proceedure. Landry V. Acme Flour Mills Co.,202 Okl.170,211 F.2d 512,515 Rights of injured one to secure redress for violation of his rights. Fields V. Synthetic Ropes Inc. Story 135,215 A2d 427,432 A right presently to enforce a cause of action by Suit,McMahon V.U.S. C.A. PA., 186 F2d 227,230.Operative facts giving rise to a right of Action Comp-risea "Cause of Action" Shiftlet V. Eller, 228 Va.115,319 S. E.2d 750, 754. Failure to act by refusing or any act of crime Rico Statue and the Lacler of there hearin Searbrough V. Pickens,26 Tenn. App. 213,170 S. W.2d 585, 588 Equitable Estoppel and see Hutchingson V. Kenny, C.E. A.N.C.,27 F.2d 254,256 and see Croyle V. Croyle,184 Md. 126,40 A.2d 374,379 their petition is designed to make you just or liable as the Defendant within the Exhibits that has been copy for this case Human V. Employees Reinsurance Corp.,345 Mo.650,136 S.W.2d 289,302.0 also see Legal obligations against the State Forthworth Cavalry Club,Inc.

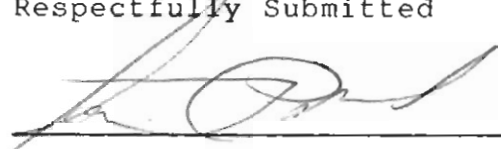
I will be waiting for the defendants to be contacted so I can cross examine accord to 1915(D) Bayor V. Trudeau, 702, F.2d 43(23 Cir.1983; Frier V. Bayner, 618 F.2d 988 C.2d Cir.1980), Cline V. Herman Col F.2d 374(8th Cir.1979); U.S. V. Hunnell, 587 F.2d 962(7th Cir.1978).

This Court should grant leave freely to amend a complaint see Foman V. Davis, 371 U.S. 178, 83 S. Ct. 227(1962); Martens V. Hunnell, 587 F.2d 962 (7th Cir.1978).

Wherefore, Samuel T. Poole BN-5599, Prays that the Court gives him opportunity to be heard and to enforce Law through a Grand Jury or U.S. Attorney to investigate and protect his rights and his son, and before Jury or a Court having power to hear and determine the case Kazubowski V. Kazubowski, 45, 111, 2d 405, 259 N.E. 2d 282, 290, Fairness of Justice bring the criminal to Justice Vaughn V. State 3 Tenn. Crim. App. 54.456, S.W.2d. 879, 883. and violation of Const. Rights Lloyd V. Borough of Stone Harbor, 179 N.J. Superior, 496, 432 A.2d 572, 580 holding the defendants responsible for the criminal Act far as monetary damages such as Compensatory Damages and Punitive Damages and whatever a Jury or the investigation finds them guilty of and liable under 42 U.S.C §1985(2) and (3). 1983, 1993, 1981

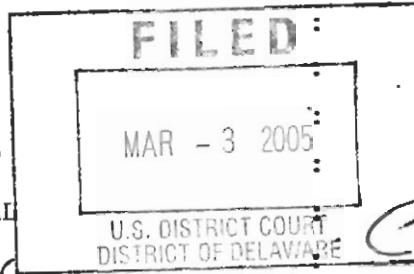


Respectfully Submitted


Samuel T. Poole BN-5599
P.O. Box 1000
Houtzdale, PA. 16698-1000

SAMUEL T. POOLE

ORIGINAL



CIVIL NO: ~~05-233~~

JURY DEMANDED

Vs.

Jane Brady
FAMILY COURT, ET AL

State Police

John Doe

*By MAIL
LFP*

Criminal Civil Complaint

Motion for leave to file a Supplemental Complaint:

SAMUEL T. POOLE, (PLAINTIFF), Pursuant to Rule 15(d), Fed. R. Civ. Proc., requests leave to file a Supplemental Complaint.

1. Events have occurred since the Plaintiff filed his Complaint, which similar in nature to the Complaint filed on ~~5-1-05~~.
2. Defendants will not be prejudiced by the filing of this Supplemental Complaint.
3. The interests of justice will be served by this Court Hearing at one Trial, all the allegations contained in the Complaint and supplemental Complaint.

1. FAMILY COURT LAW, DELAWARE:

Back in 1996 the State of Delaware held an Illegal Hearing when SAMUEL JORDAN POOLE, was 4½ years old, fully aware that Jurisdiction was not in the State of Delaware. Paternity of the child was done with a Birth Certificate and Social Security Card, to where I was never contacted by the Court or the Defendant (The Petition was filed through criminal means), Sherrlyn Connor was not the Petitioner, Ms. Emma Hayer was.

During the Hearing, the Master, Loretta M. Young asked Sherrlyn Connor, who is the father?, she stated twice Samuel T. Poole was the father at that time. At that time Master Young lashed out at Sherri Connor, threatened her by bringing her back up from Philadelphia Rehab and putting her in jail (after Ms. Connor willing stated I SAMUEL T. POOLE was the father.

Master Young then asked Norman Hayer if he would like a blood test or a DNA Test and he said no to both of the tests.

The Hearing was entered through bribery, forgery of Ms. Connor's name and then altering the final order by placing Ms. Connor as the Petitioner gave the hearing the power to go across State Lines, into the rehab where Ms. Connor was and then held the Hearing by phone, this was set up by the clerk (John Doc) in Delaware.

I have been supporting and taking care of him by supplying clothing, milk, pampers, and a roof over his head and medical care. I was never asked or contacted by anyone and even by the mother, was I the father of my son Samuel T. Poole.

DELAWARE COUNTY COURTHOUSE IN PENNSYLVANIA

In 1999, Ms. Emma Hayes snatched up my son, then raced down the highway with him, my family followed her while my sister phoned the police. When the Police arrived and told Ms. Hayes, I don't care what you have, Mr. Poole's name on the birth Certificate, it will be kidnapping and Ms. Hayes will be charged with it against Mr. Hayes. I had custody because the mother was locked up at Delaware County Prison in Pennsylvania on drug charges. The family of Hayes was aware of it, then the police officer also stated to Ms. Hayes to take it to Court where the child's been living for the past 6 months, which was the state of Delaware.

Ms. Hayes, fully aware of Sherri Connors residence of Delaware from being on probation and collecting welfare and the residence was, 1222 Lancaster Ave., Wilm., Delaware, 19801. Ms. Hayes then went out to the Media Courthouse to a Judge, being Master Florence F. Wright, Esq.. There was a Hearing conducted without the parents being contacted, at this time Master gave Ms. Hayes full custody, changing the last name to Hayes by adding it to the birth Certificate. Nobody was ever contacted.

Before this could be done, Child Protective Services of Delaware County Bar Association could sign it (Child Protective Services was never contacted). The mother and father were never contacted about this Hearing because there is no record of it, the investigation would have shown that by Child Protective Services in Delaware County.

I told sherri to give my mother custody of my two children in case something happens to me to protect the kids. (I was wanted for Parole and a drug charge in Delaware

Then Sherri Connors was released and began getting a lot of letters stating that Ms. Hayes had full custody of the minor SAMEUL T. POOLE. I was aware of the personal friendship between the Wright family dated back to 1995 when the Master Florence Wright's husband conducted the Hearing. Robert Wright doing the same thing with another child named (Roman) Emma Hayes has been friends with him since high school.

If Child Protective Services would have investigated, all of this would have been found out, but the Judge must order it, plus chief Judge Robert Wright, her husband, but for 3½ years, Sherri Connors and my family and I were raising my two children, this is another reason Ms. Hayes would not have gotten custody. So Sherri Connors filed it in court, stopping all of this from taking place, she had gotten a lawyer to represent her while she was in Court. The Lawyer was told to sit down and shut up in Master Wright's Courtroom and Sherri Connor stated twice, I was the father. Ms. Connor was threatened by the court and stated Norman Hayes was the father on March 10, 1999.

Ms. Hayes had gotten visitation to the State of Delaware at 1222, Lancaster Ave., Wilm., Delaware, 19801. Sherri Connor had a bad drug problem when pressure was applied, she got afraid and then she told them what they wanted to hear so she could get out of there.

I knew I was going to get caught sooner or later, I will take care of it then, the HEARSAY of Ms. Hayes is more powerful than the mother and father (no one has the power to walk up in court and get custody through hearsay.

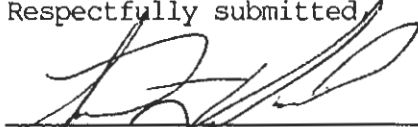
COMMENT Ms. Hayes could not get custody or a hearing in the State of Delaware who had jurisdiction over this case by law where the child resides for 6 months but for over a year.

This continued through April 11, 1999, and from May 30, 1999. At the same time I was trying to get a hearing in Delaware on July 25, 1999, my Petition was entered and stayed on the Clerks desk until February of 2000, where Judge Tumas in Delaware had gotten it of the Clerks desk.(After Judge Redavid I will state about Judge Tumas.

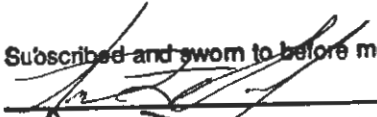
Judge Redavid was aware of the conflict because I wrote to him and he said wait until I get out of jail; If my child is in danger I've got to wait a couple of years to do something about it. He was fully aware of the forgery, Jurisdiction, and personal friendship between Ms. Wright and Ms. Hayes. So he ordered a child Psychologist to look at him with my family and Ms. Hayes never brought the child but instead we believe she brought another child and then told me I've got to wait untill after I get out of prison. It doesn't matter

I must throw myself on the mercy of the Court to take this time to investigate the criminal means. This was done, Judicial Misconduct, acting under the color of law while committing a crime, such as bribery, forgery, and all of this will show KIDNAPPING, Statute of Limitations only applies to Civil Suits, when SAMUEL T. POOLE, is served by the court of the parties in the Petition that was filed but based on the civil conspiracy. I've got to be kept out of the loop or you might see I am the problem in this matter, also you will see how this case was Monopolized around Ms. Emma Hayes and the Hearing that took place.

Respectfully submitted,


SAMUEL T. POOLE
BN-5599
P.O. BOX 1000
HOUTZDALE, PA 16698-1000

DATED: ____/____/____

Subscribed and sworn to before me by

this
4th day of Dec., 2003.


Notary Public

Notarial Seal
Thomas A. Shorts, Notary Public
Houtzdale Boro, Clearfield Co.
My Commission Expires Oct. 5, 2006

SAMEUL T. POOLE BN-5599
PLAINTIFF

:

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Case 110

F

V.

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*Jack Brady***ORIGINAL***Criminal and Civil + Amended*ET. AL.DEFENDANTS

:

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MAR - 3 2005

MOTION FOR LEAVE TO AMEND COMPLAINTU.S. DISTRICT COURT
DISTRICT OF DELAWARE

PLAINTIFF, SAMUEL T. POOLE, pursuant to Rule 15(A) and 19(A)
F.R.C.P. requests leave to file an Amended Complaint by PRO-SE.

1. Plaintiff in my original complaint did not name all the Defendants, Clerk of Court in Delaware Family Court (JOHN DOC) (nickname Redda) Delaware County Bar Association (JOHN DOC), I have no idea who this is, just that it was Forgery and Conspiracy to bring about Kidnapping.

2. I was waiting for the Defendants to be contacted so I can cross examine according to 1915(D) BAYOR V. TRUDEAU, 702 F.2d 43 (23 Civ. 1983); FRIER V. BARNER, 618 F.2d 988 (2d Civ. 1980), CLINE V. HERMAN 01 F.2d 374 (8th Cir. 1979); UNITED STATES V. HUNNELL, 587 F.2d 962 (7th Cir. 1978).

3. This Court should grant leave freely to amend a Complaint SEE: FOMAN V. DAVIS, 371 U.S. 178.83 S.Ct. 227 (1962); MARTENS V. HUNNELL, 587 F.2d 962 (7th Cir. 1978).

Family Courthouse in the State of Delaware, Civil Conspiracy, Forgery, Altering Documents, and to show there was no Certificate of Service and to show Kidnapping upon entry.

COLOR OF LAW, 42§ 1983, 3656 CZAJKOWSKI V. CITY OF CHICAGO, ILL., N.D. 111. 1992, 810 F.Supp 1428 and in CONSTITUTIONAL DEPRIVATIONS, INDEPENDENCE PUBLIC MEDIA OF PHILA. INC. V P.A. PUBLIC TELEVISION NETWORK COM" E.D. PA. 1992, 808 F.Supp. 416, and to show that all the three can be held liable with the State, 42 U.S.C. § 1997 (A.C) and under SATCHELL V. DILWORTH, 745 F.2d 781, 786 (2nd Civ. 1984) since you want to claim Statute of Limitations you have 30 days to present it dated back from 1996. (Certificate of Service) sum of \$10,000,000.00 because the Clerk and Ms. Hayer and Norman should have been under investigation by now and nothing was ever done about this. This amount is not excessive because I make sure that Criminal Charges with Civil Damages because of failure to do anything about it.

NO RECORD: CIVIL CONSPIRACY, MASTER FLORENCE WRIGHT, EMMA HAYER, AND (JOHN DOE DELAWARE COUNTY BAR ASSOCIATION. There is no record of the Hearing, no investigation, fully custody through hearsay, either parent contacted criminal act of forgery of the Birth Certificate by adding the name Hayer to the birth Certificate, conducting a Hearing for Personal Friend since Highschool, bias (this is a hearing that is being covered up) the only way I can prove it is to get the Birth Certificate that Ms. Hayer forged of get a second on, the three of them conspired together and did. (Only the Judge could get this, I cannot get this information. JURNEL V. COLLIC N.E. APP-1 471 S E 2d 433, 1996.

The Hearing on March 10, 1999, visitation hearing, the Master Florence Wright, this was to stop the civil conspiracy, but the lawyer that was representing Ms. Connor was told to sit down and shut up in her Court, the mother stated twice I was the father, the third time between Ms. Hayer and the Master Florence Wright threatening her she said Norman was the father, but during this Hearing nothing was said about them changing the birth Certificate.

Legal Fraud was covered up so nobody will know about COFFEY V. WILINGER, 156 Ind.APP. 233, 296. N.E.2d 154, 160. When the court Conspired with the party inside the custody suit acting under color of law to forge any documents and the cover up, TERRELL V. BREWER, 935 F.2d 1015, 1018 (9th Cir. 1991) the Master, Florence Wright can be sued and that under Title 28§ 455. Disqualification (B)(1)(5) and under Title 18§ 201 (A)(3)(B)(1) A,B,C, because of the masters direct involvement in this case, only she could order the investigation, this is the main problem in this case, the child legally resided in Delaware, MITCHELL V. KINNEY, 242 ALA, 196, SO.2d 788, 793, to make

When this all began in 1996 upon entering the Courtroom, COFFEY V. WININGER, 156 Ind. App. 233, 296 N.E.2d. 154, 160, the name was placed on the petition as the petitioner because Sherri Connor was in re-hab for woman which the Court could not enter without her being there. The child was 4½ months old and Legally Resides under the law for six months, MITCHELL V. KINNEY, 242 ALA, 196 SO.2d 788, 793, (he was not born 6 months) the only way at the hospitas where I was placed as the father of Samuel Jordan Poole. The Prejudice, Prejudicial on the way the Hearing was handled by the Master the mother entered to voluntary parties that I was Samuel J. Poole, father but after being threatened by Ms. Hayer and then the Judge threatened Sherri Connor and her Counselor at the re-hab in Philadelphia, PARGO V. ELLIOTT 49 F.2d 1355 (8th Cir. 1995) and then asked Norman Hayer did he want a blood test he stated no. this Hearing was conducted across the State Line by a phone, only FEDERAL can conduct this Hearing, plus neither party was a resident of Delaware. To show prejudicial and now (Statute of Limitations the Court must show I was served) once my name was placed on this Birth Certificate the Court must serve me, the father, by law, this Petition was served to me by Ms. Emma Hayer's lawyer after I filed this Suit to which, under 42 U.S.C. § 1985(2) and (3) clearly state the Master and anyone that is involved could be held liable, but to alter the Document coming out of the court by the Clerk (John Doe) and for Ms. Hayer to bribe the Clerk of Court to do this makes it even more criminal.

There are no Statute of Limitations for the criminal act of Kidnapping.

Civil Damages, You must serve the persons rights that you are trying to take once you serve that person and only then. I have two years to fight it but a true conspiracy is not letting me find out about it. So the Attorney General has 30 days to comply with the Certificate of Service to Samuel T. Poole, and the Court. I will be requesting for Punitive damages and Compensatory Damages for the sum of \$1,000,000.00, for mental anguish and failure to act and Punitive Damages for the sum of \$1,000,000.00 for acting under the color of law.

FAILURE TO ACT, SMITH V. ROSS, 482 F.2d 33, 366(6th Cir. 1978), accord, ESTELLE V. GAMBLE, 429 U.S. 97, 106, 97 S.Ct. 1976, ALEXANDER V. PERRILL, 916 F.2d 1392, 1395 (9th Cir 1990), for the sum of \$1,000,000.00.

visitation, custody or changing the Birth Certificate and keeping siblings together, HOWZER V. HOWZER, 735, SO.2d 619 (2a 1999). After taking care of my family for 3½ years Ms. Hayer would not, and could never have gotten a Hearing without this corruption, this would never have happened, WEST V. ATKINS, 487 U.S. 42.50, 108 S.Ct. 2250 (1988); Accord MONROE V. PAPE, 365, U.S. 167, 184, 81, S.Ct. 473 (1961).

Misuse of power, possessed by virtue of State Law and made possible only because the wrongdoer is clothed with the authority of State Law, action taken under color of State Law. MONROE V. POPE, 365 U.S. at 184, quoting UNITED STATES V. CLASSIC, 313 U.S. 325, 326 (1941); Accord WEST V. ATKINS, 487 U.S. at 50; BROWN V. MILLER, 631 F2d 408, 411 (5th Cir. 1980), and this visitation order was to 1222 Lancaster Ave., Wilmington, Delaware. This case was based upon getting a personal friend to conduct the Hearing, I will be seeking the sum of \$100,000.00 for compensatory damage against all Defendants and for punitive damages of \$10,000,000.00, the State inside of this case and based upon 5, 6, 14th Amendments and Title P.A. 23-2511 and Civil Conspiracy and Injunction Order will be filed for Davison County, Tenn. C.A. Tenn., 514 F.2d 38, 41 U.S. V. MILLER C.A. Mass., F.2d 600, 602 that the State, County and Defendant Emma Hayer, not going to conspire together to kidnapp my son by CRIMINAL MEANS, with DELAWARE COUNTY BAR ASSOCIATION signing the documents illegally and then cover it up by Monopolizing of the investigation that should have by law, have been on file. Plus "FORGERY" COFFEY V. WILINGER, 156 IND APP 233, 296, N.E. 2d 396, 404, 286. N.C. 265, 18 U.S. CA§1201 that will be in the sum of \$10,000,000.00 dollars for the State of PA's failure to investigate into the criminal activities of this case and allow this to continue and because §§1986 provide for damages and liability for anyone "Who has knowledge that CA§ 1988 conspiracy is about to be committed and does nothing about it. KIDNAPPING BY FORCE OR FRAUD, STATE V. ROBERTS, 210 S.E. 2d 396, 404, 286. N.C. 265 U.S.CA.§1201

This is for the lawyer Mr. John W. Nails, Esq. he represented my mother and son it should have been very easy 5th, 6th, and 14th Amendment and under Title 23-2511, the father must be notified and acting under color of law but when the Forgery had taken place he did nothing about any of this, then he was aware of the Hearing with the mother and her lawyer Dryers Florence Wright failure to let him represent her by telling him to sit down in the Courtroom,

now, my mother no longer has custody and visitation given to my mother, it is because of his failure to act because she goes before her husband, which was the Chief Judge Robert Wright, DULBERG V. MOCK, 286 App Dir 1008, 145, N.Y. 5.2d 533 (1955) Modified, N.Y. 2d 54, 150 N.Y. 5.2d 180, 133 N.E. 2d 698 (1956), Eaton V. Morse, 212 MONT. 233, 687 2d 1004 (1984); GROMES V. HAHN, 97 111 App 2d 276, 240 N.E. 2d 138 because of the lawyers actions and the fear of the personal friend with Florence Wright family, they both should have stepped down, Florence Wright because of Ms. Hayer and John Nails because of Ms. Wright. This case clearly shows ineffective and because of his action DENNIS V. SPARKS, 449 U.S. 24, 27, 28 (1980).

JOHN W. NAILS, sum of compensatory damages \$100,000.00

JOHN W. NAILS, sum of punitive damages \$1,000,000.00

WALTER T. REDAVID, Failure to exercise his authority in this case and when he told me to wait for a period of three years was really outrageous because his failure to protect the child first and allowing the corruption to continue, failure to act, SMITH V. ROSS, 482 F.2d 33, 36, (6th Cir 1978) Accord, ESTELLE V. GAMBLE, 429 U.S. 97, 106, 97 S.Ct. 1976, ALEXANDER V. REREILLE 916 F.2d 1392, 1395 (9th Cir. 1990) But the second Judge in this suit, EDWARD J. ZETUSKY, did the same thing, the problem with his petition shows my name on the Birth Certificate, meaning my mother is supposed to get custody by law, but Mr. Hayers and Firence Wright, Corruption in this case by forging the Birth Certificate and getting full custody of my son plus all the 5 cases is a violation of 5, 6, 14th Amendments and Title C.S.A. 23-2511 law, the right to be heard, plus, Mr. Hayer could get a Hearing in Delaware or Philadelphia, by law it is only because of this action of Florence Wright this Judicial abuse kept taking place.

Now D.N.A. Test illegally taken by Ms. Emma Hayer and the Clerk (John Doe) in the State of Delaware, LICHTENSTEIN V. LICHTENSTEIN C.A. P.A. 425, F.2d 1111, 1113, HOGA V. CLERK, 5th District 113, 111, App 3d 1050, 1069, 111. Dec. 746, 448, W.E. 2d 196, 201. I cannot have a fair defense against all of the criminal acts that have taken place in this case; Procedural Due Process MATHER V. ELDRIDGE, 424 U.S. 319, 332, 96, S.Ct. 893, 901, 47 L.2d 18 (1976) neither parent was contacted during this Hearing, both were in the ~~Delaware~~ Prison System, We did not find out until June 25, 2002 that she went and done

and Norman Hayer was in prison in New Jersey doing 25 to life. The Clerk (John Doe) has this type of access without a Judge is Criminal Statute of Limitations for a D.N.A. Testing is two years plus a Month before Judge Tumas stated that.

Clerk (John Doe)

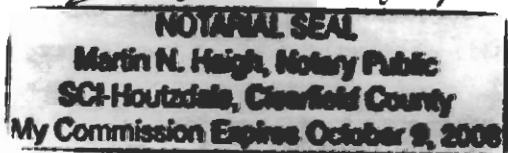
Emma Hayer

State of Delaware, Failure to act, investigate and to prosecute Emma Hayer and the Clerk (John Doe) PA. claiming they had jurisdiction since 1999.

This will be placed on the Injunction Order directed at both State for the sum of \$10,000,000.00, for allowing this to continue by failure to act on the multiple felony's. D.N.A. Testing also, legal fraud COFFEY V. WININGER, 156 Ind App., 233, 296 N.E.2d, 154, 160 Norman Hayer never took a D.N.A. Test, forged by the Clerk and her sister in law or her brother works there in Ohio, how do I know this is the second time this was done.

DATE: 2/10/05

NOTARY: 




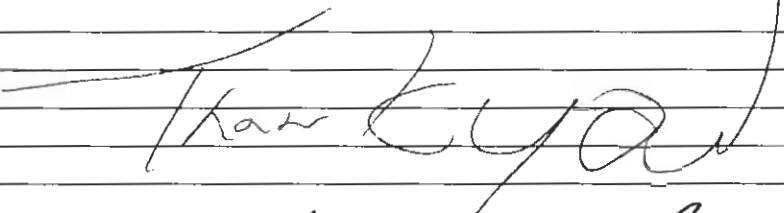

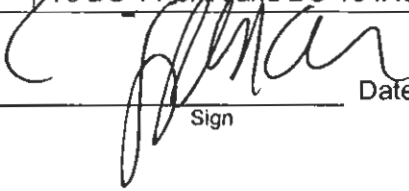
Respectfully submitted


SAMUEL T. POOLE BN-5599

P.O. BOX 1000

HOUTZDALE, PA 16698-1000

cc:file

Form DC-135A INMATE'S REQUEST TO STAFF MEMBER		Commonwealth of Pennsylvania Department of Corrections INSTRUCTIONS Complete items number 1-8. If you follow instructions in preparing your request, it can be responded to more promptly and intelligently.	
1. To: (Name and Title of Officer) <u>Business Office</u>		2. Date: <u>4-9-05</u>	
3. By: (Print Inmate Name and Number) <u>Samuel T. Poole BA5599</u>  Inmate Signature		4. Counselor's Name <u>Zettie</u> 5. Unit Manager's Name <u>Rossman</u>	
6. Work Assignment <u>NONE</u>		7. Housing Assignment <u>D-1512</u>	
8. Subject: State your request completely but briefly. Give details. <u>I need a 6 month statement to be attach to this</u> <u>German Passport.</u> <div style="text-align: right; font-size: 1.5em;">  <u>Samuel T. Poole</u> <u>BA5599</u> </div>			
9. Response: (This Section for Staff Response Only)			
Acknowledged before me by <u>Samuel Poole</u> this <u>14th</u> day of <u>APRIL</u> , 2005.		<div style="border: 1px solid black; padding: 5px;"> NOTARIAL SEAL ROBERT W. PARKS, III, NOTARY PUBLIC SCI-HOUTZDALE, CLEARFIELD COUNTY MY COMMISSION EXPIRES DECEMBER 1, 2008 </div>	
 Notary Public		To DC-14 CAR only <input checked="" type="checkbox"/> <input type="checkbox"/> Public To DC-14 CAR and DC-15 IRS <input type="checkbox"/>	
Staff Member Name _____ Print		 Sign	
_____ Date		<u>4/1/05</u>	

Samuel T. Poole BN/5597
PO Box 1000
Hortdale PA
16698-1000



Clerk of Court
844 N. King St, Lockport
William De
U.S.M.S. X-RAY
19801-3570